

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOROTHY STANLEY, as Executrix of the
ESTATE of HELEN RUNGE,

Plaintiff,

v.

WALTER J. KELLEY; KERRY L.
BLOOMINGDALE, M.D.; and
SUNBRIDGE NURSING AND
REHABILITATION CENTER,

Defendants.

Civil Action No. 05-10849-RGS

**DEPOSITION DESIGNATION
BY DEFENDANT SUNBRIDGE**

Pursuant to this Courts Orders of October 12, 2007 (Docket entry # 112) and May 13, 2008, Defendant Mediplex of Massachusetts, Inc. d/b/a SunBridge Care and Rehabilitation for Randolph, designates the following deposition testimony for use at trial:

Gilbert Stanley

Volume I

4:2 – 4:10

8:12 – 9:13

11:22 – 12:10

13:4 – 13:11

29:2 – 29:11

33:4 – 34:2

49:19 – 50:3 (objected-to by Plaintiff)

91:24 – 95:19 (objected-to by Plaintiff)

96:23 – 99:15 (objected-to by Plaintiff)

137:2 – 138:1

146:12 – 147:21

149:3 – 150:2

150:17 – 154:8

165:21 – 166:4

167:20 – 168:10

Volume II

18:6 – 18:17

Helen Runge

4:2 – 4:18

4:22 – 4:24

5:3 – 5:7

5:17 – 8:9

8:20 – 9:9

SunBridge's Objections to Plaintiff's designations

The Plaintiff made the following disposition designations:

1. Deposition of Walter J. Kelly, December 1 and 14, 2006, in its entirety;
2. Deposition of Farrah Seidler, May 8, 2007, in its entirety; and
3. Deposition of Sandra M. Porazzo-Perry, March 28, 2007, in its entirety.

SunBridge objects to these disposition being designated "in their entirety."

Respectfully submitted,

**Mediplex of Massachusetts, Inc. d/b/a
SunBridge Care and Rehabilitation for
Randolph**

by its attorneys,

CERTIFICATE OF SERVICE

I hereby certify that this Document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 13, 2008.

/s/ Michael Williams

/s/ Michael Williams

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